

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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EDWARD CARTER, FRANK FIORILLO,  
KEVIN LAMM, JOSEPH NOFI, and THOMAS  
SNYDER,

Plaintiffs,

-against-

INCORPORATED VILLAGE OF OCEAN  
BEACH; MAYOR JOSEPH C. LOEFFLER,  
JR., individually and in his official capacity;  
former mayor NATALIE K. ROGERS,  
individually and in her official capacity,  
OCEAN BEACH POLICE DEPARTMENT;  
ACTING DEPUTY POLICE CHIEF GEORGE  
B. HESSE, individually and in his official  
capacity; SUFFOLK COUNTY; SUFFOLK  
COUNTY POLICE DEPARTMENT; SUFFOLK  
COUNTY DEPARTMENT OF CIVIL SERVICE;  
and ALISON SANCHEZ, individually and in  
her official capacity,

Defendants.

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**DEFENDANT  
SANCHEZ'S  
SUPPLEMENTAL  
RESPONSE TO FIRST  
SET OF  
INTERROGATORIES**

**CV 07-1215  
(SJF)(ETB)**

Defendant, Alison Sanchez, by her attorney, hereby supplements, upon information and belief, her response to the plaintiff's First Set of Interrogatories dated July 14, 2009 as follows:

**PRELIMINARY STATEMENT**

This supplemental response is made solely for the purpose of this action. Each supplemental response is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the interrogatories were asked of, or any

statement contained herein were made by, a witness present and testifying in court, all of which objections and grounds are reserved and may be interposed at the time of trial.

Defendant reserves the right to make any changes in these supplemental answers if it appears that omissions or errors have been made herein, or that further or more accurate information is available.

Defendant has not completed her investigation of the facts relating to this action, and has not completed preparation for trial. The following supplemental answers are based on information presently available, and are made without prejudice to defendant's right to utilize subsequently discovered facts.

Except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that defendant has supplemented her answer to any interrogatory should not be taken as an admission that defendant accepts or admits the existence of any facts set forth or assumed by such interrogatory, or that such answer or supplement constitutes admissible evidence. The fact that this defendant has supplemented her answer to any or all of any interrogatory is not intended, and shall not be construed to be a waiver by defendant of all or part of any objection to any interrogatory.

1. Objection on grounds of relevance, materiality and overbreadth. While fully reserving her rights under said objections, answering defendant responds that she cannot say for certain whether or not she posted blog post no. 9 entitled "wash women" on April 6, 2006 at 8:55 pm on the Schwartz Report thread "Ocean Beach Police Corruption". In any

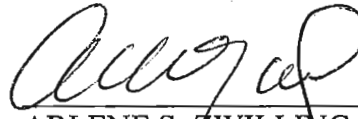
event, answering defendant was not at work on April 6, 2006 at 8:55 pm and not utilizing any computer of defendant County of Suffolk at that time. Answering defendant did have a personal computer at her home at that time, but said computer is no longer in her possession.

Dated: Hauppauge, New York  
September 14, 2009

Yours, etc.,

CHRISTINE MALAFI  
Suffolk County Attorney  
Attorney for County Defendants  
H. Lee Dennison Building  
100 Veterans Memorial Highway  
P.O. Box 6100  
Hauppauge, New York 11788-0099  
(631) 853-4049

By:

  
ARLENE S. ZWILLING (AZ 5918)  
Assistant County Attorney

TO: Ariel Graff, Esq.  
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**VERIFICATION**

STATE OF NEW YORK)  
COUNTY OF SUFFOLK) ss.:

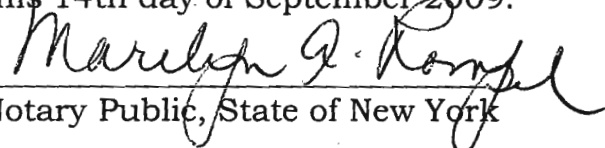
ALISON SANCHEZ, being first duly sworn, hereby deposes and states:

I am a defendant in the within action. I have read the foregoing Supplemental Response to Plaintiff's First Set of Interrogatories and Request for Production of Documents in Edward Carter, et al. v. The County of Suffolk, et al., Index No. CV07-1215 (SJF)(ETB), and know the contents thereof. The responses, which were drafted and prepared by the Suffolk County Attorney's Office, appear to be true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.



Alison Sanchez

Subscribed and sworn to before me  
this 14th day of September 2009.

  
Notary Public, State of New York

